

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CARLYLE AVIATION MANAGEMENT LIMITED, ACCIPITER INVESTMENTS AIRCRAFT 4 LIMITED, VERMILLION AVIATION (TWO) LIMITED, ACCIPITER HOLDINGS DAC, MAVERICK AVIATION HOLDINGS LTD., MANCHESTER AVIATION FINANCE S.à r.l., WELLS FARGO TRUST COMPANY, N.A., not in its individual capacity but solely in its capacity as OWNER TRUSTEE, UMB BANK, N.A., not in its individual capacity but solely in its capacity as OWNER TRUSTEE,

Plaintiffs,

v.

FRONTIER AIRLINES, INC.

Defendant.

Case No.: 1:23-cv-04774 (PAE)

**PLAINTIFFS' NOTICE OF MOTION FOR LEAVE TO FILE SUPPLEMENTAL
COMPLAINT**

PLEASE TAKE NOTICE that, upon the memorandum of law submitted herewith, Plaintiffs hereby move this Court, before the Honorable Paul A. Engelmayer, United States District Judge for the Southern District of New York, 40 Foley Square, Courtroom 1305, New York, New York 10007, for an order pursuant to Federal Rule of Civil Procedure 15(d) permitting Plaintiffs to file the proposed supplemental complaint attached as Exhibit A to the Declaration of Jed M. Schwartz in Support of Plaintiffs' Motion for Leave to File Supplemental Complaint and granting such further relief as the Court deems just and proper.

Dated: November 9, 2023
New York, New York

MILBANK LLP

/s/ Jed M. Schwartz

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